

The Examiner rejected claims 34-39 and 68-71 as being obvious over U.S. Patent No. 5,183,4040 to Aldous et al. ("Aldous") in view of U.S. Patent No. 4,611,875 to Clarke et al. ("Clark"), U.S. Patent No. 4,241,974 to Hardesty ("Hardesty"), and a research disclosure entitled "Integrated Services Digital Network (ISDN) Cable Terminator/Filter Device," and published by Kenneth Mason Publications Ltd., England in September 1990 ("Research Disclosure"). Applicants respectfully traverse this rejection, since none of the prior art references, alone or in combination, disclose, teach or suggest the combination of elements required by the claims.

Applicants would like to emphasize that their contribution in first recognizing that there was a problem in the PCMCIA connector device prior art, and then developing an elegant solution to address this problem, should not be ignored. M.P.E.P. 2141.02 ("[A] patentable invention may lie in the discovery of the source of a problem even though the remedy may be obvious once the source of the problem is identified. This is part of the 'subject matter as a whole' which should always be considered in determining the obviousness of an invention under 35 U.S.C. §103.") (emphasis in original). Specifically, Applicants recognized that connector device receptacles that received RJ-xx plugs were often broken and damaged, thus resulting in the entire connector device being discarded and replaced. (Specification, page 4, lines 13-15). Posed with this problem, Applicants came up with a solution by developing various types of removable bodies and housings that are configured to receive RJ-xx plugs, which if broken or damaged, can be easily replaced without replacing the entire connector device.

Applicants maintain that there is no suggestion to use the adapters disclosed in Clark, Hardesty, or the Research Disclosure, to improve the Fig. 7 Aldous connector device (or any device disclosed in Aldous) to solve the above-mentioned problem, or for that matter, any problem. First, the adapters disclosed in the cited references cannot be considered an equivalent

to the DAA adapter assembly used in the Fig. 7 connector device, since such adapters do not have DAA functionality, thereby rendering the modified Aldous device unsatisfactory for its intended purpose. M.P.E.P. 2143.01 ("If proposed modification would render the prior invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.").

Second, the teachings of the cited references not only address entirely different problems irrelevant to PCMCIA connector devices (or any connector device used in a computer), but the adapters disclosed in these cited references are unsuitable for use in PCMCIA connector devices. Specifically, Hardesty discloses a multi-outlet adapter for telephone cords, which is plugged into a wall terminal to allow simultaneous connection to two telephone cords (see Abstract). Because there is no apparent reason to provide a PCMCIA card that has the capability of simultaneously connecting to two telephone lines, there is no suggestion to use the Hardesty adapter in any of the Aldous connector devices. The only apparent way to use the Hardesty adapter with an Aldous connector device is to connect a telephone line between them, which would result in a device completely different from the claimed invention. In fact, Hardesty actually teaches away from using its adapter on a communications connector, since the Hardesty adapter is plugged into a standard telephone jack, which if installed on a PCMCIA connector device, would have the same problems as the prior art connector devices. That is, the telephone jack could be broken or damaged, necessitating replacement of the entire communications device.

As for Clarke, it discloses a power adapter for supplying power to a telephone station (see Abstract). Because power is provided to PCMCIA cards via the device in which they are installed, there is no suggestion to use the Clarke power adapter with any of the Aldous connector devices. Lastly, the Research Disclosure discloses an ISDN cable terminator/filter

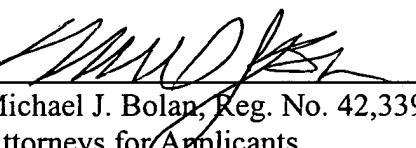
device that is used to provide ISDN services. It appears from its disclosure that the ISDN device is to be plugged into a wall unit to provide ISDN service and filtering for ISDN telephones. There is no suggestion to use that ISDN device with any of the Aldous connector devices, and, like the Hardesty adapter, the only apparent way to use the ISDN device with an Aldous connector device is to connect a telephone line between them (assuming that the Aldous connector device has ISDN functionality at all), which will produce a resulting assembly that is different from the claimed invention. And like Hardesty, the Research Disclosure appears to teach away from using the ISDN device, since it would require the installation of a telephone jack in the connector device, and would thus have the same problems as the prior art connector devices.

Thus, Applicants believe that claims 34-39 and 68-69 are not obvious in view of Aldous in combination with either Hardesty, Clarke, or the Research Disclosure. As such, Applicants respectfully request the Examiner to withdraw the §103 rejections of claims 34-39 and 68-79.

Conclusion

Based upon the foregoing amendments and remarks, it is respectfully submitted that, with entry of this amendment, the application is in condition for allowance. Should the Examiner have any questions or comments, he is invited to call the undersigned at (949) 567-2300.

Respectfully submitted,
LYON & LYON

By: 
Michael J. Bolan, Reg. No. 42,339
Attorneys for Applicants

Dated: September 6, 2001

MJB/dmd
633 W. Fifth Street, Suite 4700
Los Angeles, California 90071
Tel.: (949) 567-2300 or (213) 489-1600



Patent
264/114

Version With Markings To Show Changes Made

34. (Four Times Amended) A communications device, the communications device compliant with PCMCIA communications standards and which can be received by a signal utilizing device, comprising:

connector housing means for interfacing with a communications line;

body means for making operative and removable connection with the signal utilizing device;

means for removably attaching the connector housing means to the body means such that the connector housing means and the body means are held together as a unitary module; and means for conveying a communications signal between the communications line and [a] the signal utilizing device.

RECEIVED
TC 2800
SEP 12 2001
2001 ROOM

39. (Four Times Amended) A communications device, the communications device compliant with PCMCIA communications standards and which can be received by a signal utilizing device, comprising:

[a] connector housing means adapted for interfacing with a communications line;

[a] card body means adapted for making operative and removable connection with the signal utilizing device;

means for removably attaching the connector housing means to the card body means such that the connector housing means and the card body means are held together as a unitary module; and

means for conveying a communications signal between the communications line and a signal utilizing device.